

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AMY COOPER,

Plaintiff,

v.

FRANKLIN TEMPLETON, FRANKLIN  
TEMPLETON INVESTMENTS, FRANKLIN  
RESOURCES, INC., JENNY JOHNSON,  
FRANKLIN TEMPLETON CORPS. XYZ 1-10,  
JOHN DOES and/or JANE DOES 1-10,

Defendants.

Civil Action No. 1:21-cv-04692-RA

**DECLARATION OF GRACE E. SPEIGHTS IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS**

I, Grace E. Speights, hereby declare as follows:

1. I am a Partner at the law firm of Morgan, Lewis & Bockius LLP, counsel of record for Defendants Franklin Templeton, Franklin Templeton Investments, Franklin Templeton Resources, Inc., and Jenny Johnson.
2. I have personal knowledge of the facts set forth in this declaration and make this declaration in support of Defendants' Motion to Dismiss Plaintiff Amy Cooper's Complaint in the above-captioned action.
3. Attached hereto as Exhibit "A" is a true and copy of a Tweet posted by Melody Cooper on May 25, 2020, which is publicly available at:  
<https://twitter.com/melodymcooper/status/1264965252866641920?lang=en> and a true and correct copy of the transcript of the video embedded in the Tweet.

4. Attached hereto as Exhibit “B” is a true and correct copy of an NBC News Story titled “Woman in Racial Central Park Confrontation is Fired From Job, Gives Up Dog,” first published on May 25, 2020, which is publicly available at:

<https://www.nbcnewyork.com/news/local/central-park-confrontation-goes-viral-white-woman-calls-cop-on-black-birder/2431773/>.

5. Attached hereto as Exhibit “C” is a true and correct copy of a Statement from Amy Cooper on the Central Park Incident dated May 26, 2020, which is publicly available at:

<https://www.prnewswire.com/news-releases/statement-from-amy-cooper-on-central-park-incident-301065492.html>.

6. Attached hereto as Exhibit “D” is a true and correct copy of a Statement from the Manhattan D.A. Cy Vance, Jr. dated October 14, 2020 re: Amy Cooper Charged in Criminal Court for False Police Report in Central Park, which is publicly available at:

<https://www.manhattanda.org/d-a-vance-amy-cooper-charged-in-criminal-court-for-false-report-in-central-park/>.

7. Attached hereto as Exhibit “E” is a true and correct copy of a Facebook post by Christian Cooper on May 25, 2020, which is publicly available at:

<https://www.facebook.com/christian.cooper1/posts/10158742137255229>.

8. Attached hereto as Exhibit “F” are true and correct copies of representative social media posts commenting on the Central Park incident posted on May 25, 2020 before the company issued a statement, which are publicly available at the links contained in the attachment.

9. Attached hereto as Exhibit “G” is a true and correct copy of an index of news coverage of the Central Park incident that were published or broadcasted on May 25 and 26, 2020, which are publicly available at the links contained in the attachment.

10. Attached hereto as Exhibit “H” is a true and correct copy of a Tweet posted by the company on May 25, 2020, which is publicly available at:

[https://twitter.com/FTI\\_US/status/1265111264335986689?ref\\_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1265111264335986689%7Ctwgr%5E%7Ctwcon%5Es1\\_c10&ref\\_url=https%3A%2F%2Fpublish.twitter.com%2F%3Fquery%3Dhttps3A2F2Ftwitter.com2FFTI\\_US2Fstatus2F1265111264335986689widget%3DTweet.](https://twitter.com/FTI_US/status/1265111264335986689?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1265111264335986689%7Ctwgr%5E%7Ctwcon%5Es1_c10&ref_url=https%3A%2F%2Fpublish.twitter.com%2F%3Fquery%3Dhttps3A2F2Ftwitter.com2FFTI_US2Fstatus2F1265111264335986689widget%3DTweet.)

11. Attached hereto as Exhibit “I” is a true and correct copy of a Tweet posted by NYC Mayor Bill de Blasio on May 26, 2020, which is publicly available at:

[https://twitter.com/nycmayor/status/1265265665755230209?lang=en.](https://twitter.com/nycmayor/status/1265265665755230209?lang=en)

12. Attached hereto as Exhibit “J” is a true and correct copy of a Tweet posted by the company on May 26, 2020, which is publicly available at:

[https://twitter.com/FTI\\_US/status/1265348185201008641?ref\\_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1265348185201008641%7Ctwgr%5E%7Ctwcon%5Es1\\_c10&ref\\_url=https%3A%2F%2Fpublish.twitter.com%2F%3Fquery%3Dhttps3A2F2Ftwitter.com2FFTI\\_US2Fstatus2F1265348185201008641widget%3DTweet.](https://twitter.com/FTI_US/status/1265348185201008641?ref_src=twsrc%5Etfw%7Ctwcamp%5Etweetembed%7Ctwterm%5E1265348185201008641%7Ctwgr%5E%7Ctwcon%5Es1_c10&ref_url=https%3A%2F%2Fpublish.twitter.com%2F%3Fquery%3Dhttps3A2F2Ftwitter.com2FFTI_US2Fstatus2F1265348185201008641widget%3DTweet.)

13. Attached hereto as Exhibit “K” is a true and correct copy of a Statement from the NYC Commission on Human Rights dated May 27, 2020 re: NYC Commission on Human Rights Announces an Investigation into the Central Park Incident, which is publicly available at:

<https://www1.nyc.gov/assets/cchr/downloads/pdf/press-releases/Central-Park-release-final.pdf>

14. Attached hereto as Exhibit “L” is a true and correct copy of a Statement from the Manhattan D.A. Cy Vance, Jr. published on July 6, 2020 on the Incident in the Central Park Ramble on May 25, 2020, which is publicly available at:

[https://www.manhattanda.org/statement-from-manhattan-d-a-cy-vance-jr-on-incident-in-central-park-ramble-on-may-25-2020/.](https://www.manhattanda.org/statement-from-manhattan-d-a-cy-vance-jr-on-incident-in-central-park-ramble-on-may-25-2020/)

15. Attached hereto as Exhibit “M” is a true and correct copy of a CNN News Story titled “Charge Against Amy Cooper dropped after completing racial bias education program” last updated February 16, 2021, which is publicly available at:

<https://www.cnn.com/2021/02/16/us/amy-cooper-birdwatching-charge/index.html>.

16. Attached hereto as Exhibit “N” is a true and correct copy of the interview with Jenny Johnson and Bloomberg News on June 2, 2020, which is publicly available at:

<https://www.bloomberg.com/news/videos/2020-06-02/franklin-ceo-says-facts-behind-amy-cooper-firing-were-undisputed-video> and a true and correct copy of the transcript of the video.

17. Attached hereto as Exhibit “O” is a true and correct copy of the interview with Jenny Johnson and Fortune on July 6, 2020, which is publicly available at:

<https://fortune.com/2020/07/06/amy-cooper-franklin-templeton-ceo/> and a true and correct copy of the transcript of the video.

I declare under the penalty of perjury and pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on this 9th day of August, 2021.

/s/ Grace E. Speights  
Grace E. Speights